

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

TECSEC, INC.,  
Plaintiff,

v.

INTERNATIONAL BUSINESS  
MACHINES CORPORATION, *et al.*,  
Defendants.

NO. 1:10-cv-00115-LO-TCB

**MOTION TO EXCLUDE PLAINTIFF’S DAMAGES EXPERT OPINIONS**

PURSUANT TO Rule 702 of the Federal Rules of Evidence, Defendants Oracle Corporation and Oracle America, Inc. (“Oracle”) move to exclude the opinions proffered by Plaintiff’s damages expert. The grounds and reasons for granting this relief are stated with particularity in the accompanying brief.

Dated: November 6, 2020

Respectfully submitted,

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*Counsel for Defendants Oracle Corporation and  
Oracle America, Inc.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of November 2020, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

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